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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

I hereby certify that the
annexed instrument is a true
and correct copy of the original
on file in my office.
ATTEST: BRUCE RIFKIN
Clerk, U. S. District Court
Western District of Washington
By *H. Bent. Zachary*
Deputy Clerk

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LEWIS CLARK,

Defendant.

MAGISTRATE'S DOCKET NO.
CASE NO.

03-434 M

COMPLAINT for VIOLATION

18 U.S.C. § 2423(c)

BEFORE the Honorable Monica J. Benton, United States Magistrate Judge,
Seattle, Washington

The undersigned complainant being duly sworn states:

COUNT I

(Travel in Foreign Commerce and Engaging in Illicit Sexual Conduct with a Minor)

On dates uncertain but between May 1, 2003, and June 28, 2003, at Seattle, within the Western District of Washington and elsewhere, MICHAEL LEWIS CLARK, a citizen of the United States, did travel from Seattle, Washington, to Cambodia, and engage in illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f), with John Doe, age 10, and John Roe, age 13, in that, CLARK directed John Doe to digitally penetrate CLARK in CLARK's anus, while CLARK directed John Roe, to masturbate CLARK, by touching CLARK's penis with his hand.

All in violation of Title 18, United States Code, Section 2423(c).

1 And the complainant states that this complaint is based on the following:

2 1. I am a Special Agent with the Bureau of Immigration and Customs
3 Enforcement (ICE), known prior to March 2003 as the United States Customs Service
4 (USCS). I am currently assigned to the Seattle office. I have been employed with the
5 ICE/USCS, Office of Investigations from July 2002 to the present. I have received
6 seventeen (17) weeks of training at the Federal Law Enforcement Training Center in
7 Glynco, Georgia. My experience as an ICE/Customs agent has included the investigation
8 of cases involving the use of computers and the Internet to commit violation of federal
9 child exploitation and intellectual property laws. I have received training and gained
10 experience in interviewing and interrogation techniques, arrest procedures, search warrant
11 applications, the execution of search and seizure warrants, computer crimes, intellectual
12 property and other white collar crimes, and various other criminal laws and procedures. I
13 am also responsible for the investigation of crimes involving the sexual exploitation of
14 minors by those who travel from the United States to foreign countries to engage in illicit
15 sexual conduct with minors. The information set forth in this affidavit was provided to
16 me by ICE/Customs Senior Special Agent Gary Phillips, Deputy Customs Attache,
17 Bangkok, Thailand.

18 2. In or around the year 2000, the Australian Federal Police initiated an
19 investigation based on information that an American was believed to be molesting young
20 boys in Phnom Penh, Cambodia. That individual was later identified as MICHAEL
21 LEWIS CLARK, an American citizen. In December of 2002, Australian Federal Police
22 and Cambodian National Police obtained information and a report from an alleged victim
23 that CLARK was molesting children at the Pyco Guesthouse in Phnom Penh, Cambodia.

24 3. On June 28, 2003, CLARK was arrested in Phnom Penh, Cambodia, by the
25 Cambodian National Police, on a charge of debauchery involving illicit sexual conduct
26 with two males, ages 10 and 13 respectively.

27 4. On July 11, 2003, the Customs Attache in Bangkok, Thailand, was
28 informed of Clark's arrest.

1 5. On July 19, 2003, Phillips, Senior Special Agent Rodolfo Salcedo, and
2 United States Embassy Investigator Suos Vansak, in cooperation with a Phnom Penh non-
3 Government Organization (NGO), known as Action Pour Les Enfants, interviewed three
4 minor male children who had been victimized by CLARK. One of the boys, John Doe,
5 stated that he was 10 years old and homeless. According to Phillips, John Doe is
6 approximately 3' 11" tall and 45 pounds in weight. John Doe stated that in the late
7 morning or early afternoon of June 28, 2003, he met CLARK through another boy, John
8 Roe, age 13. John Doe stated that he and John Roe went to the Pyco Guesthouse with
9 CLARK. CLARK directed John Roe to lie on his back and CLARK kneeled on top of
10 him and masturbated CLARK with his hand. At the same time, John Doe inserted his
11 index finger in CLARK's anus. This activity continued until CLARK ejaculated onto
12 John Roe's chest. According to John Doe, CLARK used gestures to indicate what he
13 wanted and also guided him. John Doe stated that CLARK took hold of his finger and
14 gestured that he wanted John Doe to put his finger in CLARK's rectum.

15 6. On July 21, 2003, Phillips, Salcedo and Vansak met with CLARK under the
16 supervision of the Department of Prisons, Correctional Facility #1, in Deputy Director
17 Mong Kim Heng's office. Phillips interviewed CLARK after advising him of his
18 Miranda rights. CLARK initially denied being a pedophile but later stated that he has
19 been a pedophile since 1996, maybe longer, and has been involved in exploiting children
20 since he began traveling in 1996. CLARK stated that he targeted children in the river
21 front area of Phnom Penh, Cambodia, and explained further that once he decided which
22 boys he wanted to have sexual contact with, he took them to the Pyco Guesthouse and
23 engaged in sexually explicit acts with the boys. According to CLARK, the boys ranged
24 from 10 to 18 years old. CLARK stated that he paid the boys two dollars each for
25 engaging in sexual activity with him.

26 7. CLARK stated that on June 28, 2003, he had showered with John Doe and
27 John Roe, instructing them to put soap on his rectal area, explaining that he did not know
28 why he did that and that the only explanation that he could think of was that it excited

1 him. CLARK also admitted putting soap on the boys' rectal area. CLARK stated that he
2 instructed the boys to dry themselves off with a towel and get on the bed in the room he
3 had obtained at the Pyco Guesthouse. CLARK first asked John Roe to perform oral sex
4 on him, but John Roe refused. CLARK then said that John Roe may have helped him
5 obtain an erection by stroking CLARK's penis. According to CLARK, after he
6 ejaculated, he began to masturbate while John Doe digitally penetrated CLARK's rectum.

7 8. CLARK also stated that when he traveled to Cambodia in 1998, he had sex
8 with boys between the ages of 16 and 18. CLARK then stated that he has since had sex
9 with boys as young as 12 years old.

10 9. CLARK, a United States citizen and military veteran, stated that he was in
11 the United States around March 2003 and stayed with his daughter in Oregon for
12 approximately two months. CLARK told Phillips that in May 2003 he took a military
13 flight from Seattle via Japan to Singapore, and subsequently traveled to Cambodia.
14 CLARK stated that for the past five years he has spent most of his time in Cambodia.
15 CLARK also stated that he believes that he has molested approximately 40-50 children,
16 stating that some of them may have been 18 years old.

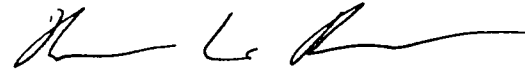
17 10. Phillips, Salcedo and Vansak also interviewed a 15 year-old boy who
18 identified a photograph of CLARK and stated that he had known CLARK for
19 approximately one year. This boy also stated that he had engaged in sexual activity with
20 CLARK on at least three occasions, the first time when he was 14 years old. CLARK

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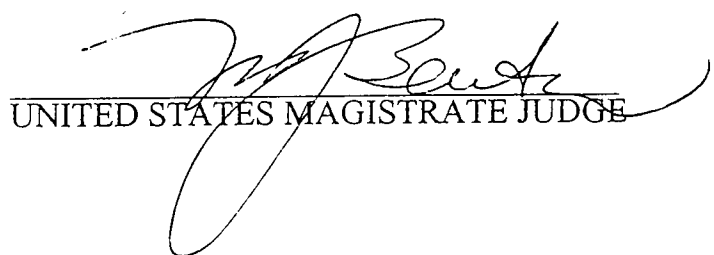
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1 instructed him to lie on a bed, kneeled above him and masturbated until he (CLARK)
2 ejaculated onto this boy's chest.
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4 

5 BRIAN C. BUJDOSO
6

7 Complaint and affidavit sworn to before me and subscribed in my
8 presence, August 13, 2003.

9 
10 UNITED STATES MAGISTRATE JUDGE
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